IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION TO PRESERVE DISTRIBUTIONS TO MITNICK LAW OFFICE, LLC

Balanced Bridge Funding LLC ("Balanced Bridge") moves the Court under Fed. R. Civ. P. 65 for entry of an order directing the Settlement Administrator to hold all distributions to Mitnick Law Office, LLC constituting legal fees in the NFL Concussion Litigation, and directing Locks Law Firm to retain any legal fees owed to Mitnick Law for referral of clients in the NFL Concussion Litigation, pending the confirmation of Balanced Bridge's arbitration award as a judgment in Case No. 2021-cv-04073-PBT. Such relief is necessary to preserve assets that would likely otherwise be unavailable to satisfy the arbitration award and anticipated judgment.

In support of its motion, Balanced Bridge relies on the accompanying brief.

Respectfully submitted,

/s/ Eric E. Reed
Eric E. Reed, Esq.
FOX ROTHSCHILD LLP
ereed@foxrothschild.com
2000 Market Street—20th Floor
Philadelphia, PA 19103
(215) 299-2000
(215) 299-2150 (facsimile)
Attorneys for Balanced Bridge Funding LLC

Date: April 14, 2022